

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019**

The law firm of Venable LLP (“Venable”) respectfully submits this Verified Statement Pursuant to Bankruptcy Rule 2019 (the “Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with its representation of a group of customers (the “Ad Hoc Group of Customers”)<sup>2</sup> of FTX Trading Ltd. and/or its affiliated chapter 11 debtors and debtors-in-possession (collectively, the “FTX Debtors”), and respectfully represents as follows:

1. Attached hereto as Exhibit A is a list of the names and addresses of each member (individually, a “Member” and collectively, the “Members”) of the Ad Hoc Group of Customers and each Member’s disclosable economic interests held in relation to the FTX Debtors as of November 11, 2022 in accordance with Bankruptcy Rule 2019. The information set forth on Exhibit A is based upon information provided to Venable by the Members of the Ad Hoc Group of Customers and is subject to change.

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Each member of the Ad Hoc Group of Customers files this Statement exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

2. On or about November 29, 2022, the Members retained Venable to represent them in connection with the above-captioned chapter 11 cases. Additional members may join the Ad Hoc Group of Customers on an ongoing basis, and Venable will file additional Statements as necessary to comply with Bankruptcy Rule 2019.

3. Each Member has consented to Venable's representation of the Ad Hoc Group of Customers and has executed an engagement letter expressly consenting to such group representation. Venable does not represent any Member in their individual capacity or with respect to any property interests or related claims other than in connection with their status as a customer and creditor of the Debtors.

4. The information contained in this Statement and/or Exhibit A attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose, including, without limitation, any restriction or limitation on the rights, abilities, or arguments of the Ad Hoc Group of Customers to assert their claims against the Debtors, recover their property held by the Debtors (or any third parties), or otherwise exercise their rights or remedies with respect to the Debtors. Nothing in this Statement or Exhibit A hereto should be construed as (i) a limitation upon, or waiver of, any member's right to assert, file, and/or amend claims, if any, in accordance with applicable law and any orders entered in the Debtors' chapter 11 cases or (ii) an admission with respect to any fact or legal theory.

5. Venable reserves the right to amend or supplement this Statement at any time on behalf of the Ad Hoc Group of Customers.

6. The undersigned verifies that the information contained in this Statement is true and correct to the best of his knowledge.

Dated: March 16, 2023  
Wilmington, Delaware

**VENABLE LLP**

/s/ Daniel A. O'Brien  
Daniel A. O'Brien (No. 4897)  
1201 North Market Street, Suite 1400  
Wilmington, DE 19801  
Tel: 302.298.3535  
Fax: 302.298.3550  
daobrien@venable.com

and

Jeffrey S. Sabin  
Carol A. Levy  
1270 Avenue of the Americas, 24<sup>th</sup> Floor  
New York, New York 10020  
Tel: (212) 307-5500  
Fax: (212) 307-5598  
jssabin@venable.com  
cweinerlevy@venable.com

and

Andrew J. Currie  
600 Massachusetts Avenue, NW  
New York, New York 10020  
Tel: (212) 307-5500  
Fax: (212) 307-5598  
ajcurrie@venable.com

*Attorneys for the Ad Hoc Committee of  
Customers and Creditors of FTX Trading  
Ltd., et al.*

**EXHIBIT A**

This Statement reflects the nature and amount of disclosable economic interests held by the Members of the Ad Hoc Group of Customers in relation to the Debtors as of November 11, 2022 based upon information provided by the Members and disclosed to Venable and remains subject to change.

This Statement is intended solely to satisfy Bankruptcy Rule 2019, to the extent such rule is applicable to the various holdings of the Ad Hoc Group of Customers, and nothing set forth herein is intended to be or shall be an admission that any Member's interests constitute a disclosable economic interests for purposes of Bankruptcy Rule 2019. The values set forth herein are not intended to be a limitation on the recovery of any Member of the Ad Hoc Group of Customers, including, without limitation, their right to recover any property in kind. Nothing herein is or is intended to be a waiver of any arguments that any property held by the Debtors is not property of the estate under section 541 of the Bankruptcy Code.

**LIST OF MEMBERS OF THE AD HOC GROUP OF CUSTOMERS**

<b>NAME<sup>3</sup></b>	<b>ESTIMATED ACCOUNT BALANCE (USD EQUIVALENT) (as of 11/11/22)</b>
Blunt Burden LLC	\$27,249,391.80
Immutable Capital Cayman	\$4,582,926.00
Ephemeral Variant LLC	\$89,189,678.70
Alabaster Holdings LLC	\$20,000,000.00
Iphigenia LLC	\$29,000,000.00
Paralimbo Holdings LLC	\$28,110,755.04

---

<sup>3</sup> The addresses for all members of the Ad Hoc Group of Customers is c/o Venable LLP, 1270 Avenue of the Americas, New York, New York 10020, Attn: Jeffrey S. Sabin, Esq. and Andrew J. Currie, Esq.